



**MCI Telecommunications
Corporation**

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Donald H. Sussman
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DOCKET FILE COPY ORIGINAL

July 29, 1999

JUL 29 1999

Anita Cheng
Common Carrier Bureau
Federal Communications Commission
The Portals, 445 Twelfth Street, SW
Washington, DC 20554

**Re: Implementation of the Subscriber Carrier Selection Changes
Provisions of the Telecommunications Act of 1996, CC Docket No.
94-129; Policies and Rules Concerning Unauthorized Changes of
Consumers Long Distance Carriers; MCI WorldCom, Inc. Request
for Waiver**

Dear Ms. Cheng:

On July 26, 1999, MCI WorldCom, Inc. (MCI WorldCom) filed a Petition for Expedited Waiver of Commission's Rules in the above-captioned proceeding. MCI WorldCom hereby withdraws that filing, and submits the attached Petition for Expedited Waiver of Commission's Rules. The requested expedited waiver allows TTI National to provide a seamless transition to former LDI customers, while ensuring that the affected customers clearly understand available choices. MCI WorldCom, therefore, requests that the Commission grant MCI WorldCom's request for expedited waiver of the Commission's verification rules delineated in §64.1150 of the Commission's rules.

Sincerely yours,

Don Sussman

Enclosure
DHS

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FEDERAL BUREAU OF INVESTIGATION
OFFICE OF THE SECRETARY

MCI WorldCom, Inc. Request for Waiver

CC Docket No. 94-129

Pursuant to §64.1150 of the Commission's rules, prior to submitting a preferred carrier change, carriers must either: (1) obtain the subscriber's written authorization; (2) obtain confirmation from the subscriber via a toll-free number provided exclusively for the purpose of confirming orders electronically; or (3) utilize an independent third party to verify the subscriber's order.¹ MCI WorldCom, Inc. (MCI WorldCom) hereby petitions for waiver of the Commission's verification rules to allow it to transfer Long Distance International Inc.'s (LDI's) subscribers to MCI WorldCom's customer base without first obtaining each subscriber's authorization and verification.

¹ See C.F.R. §64.1150.

Pursuant to a written asset purchase agreement, MCI WorldCom has agreed to purchase certain assets of LDI. The assets include, but are not limited to, all U.S. based long distance customer accounts (specifically excluding LDI Europe accounts) which have selected LDI as its provider for outbound (switched), inbound (switched) and calling card services (excluding dial around customers), and which were sold by or through independent contractors or agents on LDI's behalf.² LDI plans on shutting down its U.S. operations within a few weeks. Absent Commission action, customers would lose their long distance service provider. The special circumstances warranting a deviation or waiver from the Commission's rules and order include the need to provide seamless transitions of long distance service for the affected LDI customers.³

During the week of July 19, 1999, LDI sent letters to all former LDI customers notifying them that LDI will no longer be serving as a domestic presubscribed long distance carrier, and that beginning on or about August 1, 1999, all "1+"calls from telephone lines previously served by LDI will be completed by TTI National, Inc. (TTI National), a subsidiary of MCI WorldCom, via the MCI WorldCom network.⁴ TTI National has been selected because its product offerings most closely mirror existing

² LDI will remain in business as a telecommunications carrier and will continue to respond to pending complaints.

³ Waiver of the Commission's rules is appropriate only if special circumstances warrant a deviation from the general rule, and such deviation will serve the public interest. Northeast Cellular Telephone Co. v. FCC, 897 F.2d 1164, 1166 (D.C. Cir. 1990); WAIT Radio v. FCC, 418 F.2d 1153 (D.C. Cir. 1969).

⁴ See attached letter from LDI in Appendix A. TTI National will also provide toll-free service and/or calling card(s) to the former LDI customers who had these services on their LDI account.

services provided by LDI. The affected LDI customers will be informed that they will receive the same or better rates and services than those which they were receiving from LDI, without interruption and without need for action. The affected LDI customers will also be reminded that they are under no obligation to take service from TTI National, and that the customer is free to select another company to transmit their long distance calls.

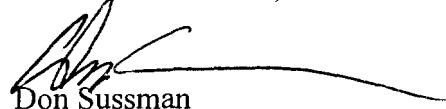
Additionally, in early August, TTI National expects to send a "welcome letter" to the affected customers with information concerning TTI National's services and rates.⁵ The "welcome letter" will include, as a gift, 100 free minutes of interstate service to be used during the first three months, and inform the customer that TTI National will issue a credit for the charge the local phone company may impose to switch long distance service to TTI National.

Expedited action on this waiver is requested. The asset purchase agreement requires the customer base to be transferred on July 31, 1999 in order to accommodate LDI's realignment of its business plan. Waiver of the Commission's verification rules in this instance allows TTI National to provide a seamless transition to former LDI

⁵ See attached "welcome letter" in Appendix B.

customers, while ensuring that the affected customers clearly understand available choices. The Commission should, therefore, grant MCI WorldCom's request for expedited waiver of the Commission's verification rules delineated in §64.1150 of the Commission's rules.

Respectfully submitted,
MCI WORLDCOM, INC.

A handwritten signature in black ink, appearing to read 'Don Sussman', with a long horizontal flourish extending to the right.

Don Sussman
1801 Pennsylvania Ave., NW
Washington, DC 20006
(202) 887-2779

July 29, 1999

APPENDIX A

IMPORTANT INFORMATION ABOUT YOUR LONG DISTANCE SERVICE

July 21, 1999

Dear Customer:

Long Distance International Inc. ("LDI") will no longer be serving as your domestic presubscribed long distance carrier. LDI has taken the steps necessary to assure that you will continue to receive quality long distance service at economical prices, without interruption and without any need on your part to take action. On August 1, 1999 or soon thereafter, when you dial "1 + " from the telephone line now served by LDI, your long distance calls will be completed by TTI National, Inc. ("TTI National") via the MCI WorldCom network. Both LDI and TTI National are working together to resolve any regulatory issues. TTI National will also replace your toll-free service and/or calling card(s) if you currently have these services on your LDI account.

We have made arrangements with TTI National to serve in our place by providing intrastate, interstate and international services to satisfy your telecommunications requirements. TTI National soon will be sending you a "welcome" letter and will provide you with information concerning your service. In addition, if your service converts to TTI National, TTI National will thank you by providing up to 100 free minutes of interstate direct-dial calling over a three-month period.

We are confident that TTI National is fully capable of providing reliable and economic telecommunications products which is why we selected this company to service your account. Of course, you are under no obligation to take service from TTI National. If you choose, you may select another company to handle your calls. Should you decide for any reason not to stay with TTI National, we recommend that you choose a replacement carrier before August 1, 1999, the planned date for the beginning of service conversion to TTI National. And, if you've implemented a "PIC-freeze" with your local exchange carrier and plan to convert over to TTI National, you may need to contact your local carrier to cause the "freeze" to be lifted for this service conversion.

If you have any questions or inquiries about your present service, please call us at 1-800-689-2913. Due to a potentially heavier than usual call volume, we request your patience if wait times are longer than normal and suggest, if possible, that you call during less active periods. TTI will also be available to answer service inquiries after your conversion at 1-800- 387-6412.

We thank you for your continued support and your business. We have enjoyed being your service provider.

Sincerely,

Long Distance International Inc.

BY: _____

APPENDIX B



Welcome To TTI National!

We're delighted to welcome you to TTI National, your new long distance telephone service provider. As announced in previous correspondence, TTI National has replaced Long Distance International (LDI) as your long distance service provider, offering an exclusive package of quality services at very competitive rates. We'd like to welcome you with a special gift of up to 100 free minutes of state-to-state direct-dial calling over a three-month period. Please note that these free minutes must be used within your first three months of service with TTI National, beginning August 1, 1999. In addition, TTI National will issue a credit for the charge your local phone company may impose to switch your long distance service to TTI National. Please call Customer Service at 1-800-893-5094 and have your local phone bill that contains the PIC Change Charge at hand.

Count On Us For Savings. You'll be amazed at what you will save with TTI National. Making long distance phone calls with TTI National is easy, too. Call anywhere in the United States by dialing 1 + area code + number. No special access numbers are needed, current domestic rates are attached. And, if you happen to call internationally, you'll benefit from our low cost, high-quality international outbound service which is available automatically with your TTI National long distance service. (In addition, country-to-country calling overseas, and calling back to the U.S., are available on request.) From TTI National, you will receive rates and services that are the same or better than those which you were receiving from LDI.

Optional Calling Cards. If you currently have an LDI calling card, a new TTI National calling card will be sent to you as a replacement in a separate mailing. Once you receive your new card, please dispose of your LDI card immediately. *If you would like additional TTI National calling cards, or do not have a calling card and would like to order one, please call TTI National Customer Service at 1 800 893-5094.*

We're At Your Service. To confirm that TTI National is your long distance service provider, please dial 1 700 555 4141 (a toll-free call) from all phone lines that have been switched from LDI to TTI National. You should hear a recording that welcomes you to the MCI WorldCom network, which carries TTI National traffic. If you do not hear this message please call Customer Service at 1 800 893-5094.

The professional customer service team at TTI National is equipped to assist you with questions about your new long distance service or monthly billing. However, should you require assistance with any previous LDI services or past LDI billing issues, please contact your former LDI customer service center at 1 888 928-7736.

Once again, we're delighted to welcome you to TTI National, your single source for reliable communications services at outstanding savings. We appreciate your business, and look forward to serving you for many years to come.

Sincerely,

Drop in signature

George Hampton
Vice President

See reverse side

TTI National Per-Minute Rates *For All **In-State** Outbound and Toll-Free Calls*

(State-to-state rate is 7.9 cents per minute)

<u>State</u>	<u>Rate</u>	<u>State</u>	<u>Rate</u>
Alabama	\$.0900	Nebraska	\$.2000
Arizona	\$.1200	Nevada	\$.1000
Arkansas	\$.1200	New Hampshire	\$.1200
California	\$.0625	New Jersey	\$.0750
California (IntraLATA)	\$.0520	New Jersey (IntraLATA)	\$.0650
Colorado	\$.1500	New Mexico	\$.1900
Connecticut	\$.0900	New York	\$.1000
Delaware	\$.0750	New York (IntraLATA)	\$.0900
Florida	\$.1050	North Carolina	\$.1400
Georgia	\$.1000	North Dakota	\$.1900
Georgia (IntraLATA)	\$.0950	Ohio	\$.0850
Idaho	\$.1700	Ohio (IntraLATA)	\$.0825
Illinois	\$.0800	Oklahoma	\$.1050
Illinois (IntraLATA)	\$.0400	Oregon	\$.1100
Indiana	\$.0950	Pennsylvania	\$.1200
Indiana (IntraLATA)	\$.0900	Pennsylvania (IntraLATA)	\$.1000
Iowa	\$.1300	Rhode Island	\$.1350
Kansas	\$.1050	South Carolina	\$.1100
Kentucky	\$.1250	South Dakota	\$.1750
Louisiana	\$.0900	Tennessee	\$.1150
Maine	\$.2500	Texas	\$.1400
Maryland	\$.0950	Utah	\$.1000
Massachusetts	\$.0975	Vermont	\$.1600
Massachusetts (IntraLATA)	\$.0640	Virginia	\$.1200
Michigan	\$.0900	Washington	\$.1100
Michigan (IntraLATA)	\$.0850	West Virginia	\$.1350
Minnesota	\$.1250	Wisconsin	\$.1000
Mississippi	\$.0950	Wisconsin (IntraLATA)	\$.0850
Missouri	\$.1900	Wyoming	\$.1450
Montana	\$.1500		

TTI National Calling Plan: Outbound and Toll-Free

Per-minute rate for state-to-state calls: 7.9 cents. In-state rates shown above. Calls are billed in 6-second increments after initial 18 seconds.

TTI National Calling Card

Per-minute rate for calling card calls (state-to-state and in-state): 14.9 cents. Domestic calls are billed in 6-second increments after initial 60 seconds.

TTI National International Service

Per-minute rates for more than 200 countries are available from Customer Service. International calls are billed in 6-second increments after initial 60 seconds.

As a result of recent regulatory reforms, a 26-cent surcharge applies to calls completed from payphones— and certain other special lines— using calling cards, toll-free numbers, prepaid phonecards or operator assistance. These calls are identified on your TTI National invoice with the word “payphone” printed under each call. Rates above filed with FCC and state commissions.

Rates do not include Presubscribed Interexchange Carrier Charge and the Federal Universal Service Fee.

Rates and charges provided pursuant to TTI National, Inc. tariffs are subject to change.

STATEMENT OF VERIFICATION

I have read the foregoing, and to the best of my knowledge, information, and belief there is good ground to support it, and that it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on July 29, 1999.

A handwritten signature in black ink, consisting of a stylized 'D' followed by a long, sweeping horizontal line that curves upwards at the end.

Don Sussman
1801 Pennsylvania Ave. NW
Washington, D.C. 20006
(202) 887-2779

CERTIFICATE OF SERVICE

I, Vivian I. Lee, do hereby certify that copies of the foregoing Opposition were sent via first class mail, postage paid, to the following on this 29th day of July, 1999.

Magalie Roman Salas*
Secretary, Room TW-A325
Federal Communications Commission
The Portals, 445 Twelfth Street, SW
Washington, DC 20554

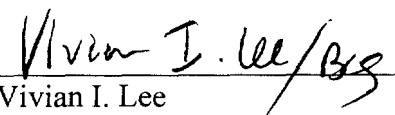
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1231 20th Street, N.W.,
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*HAND DELIVERED


Vivian I. Lee